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MRF:20037
June 12, 2017

Hon. Vincent F. Papalia, J.B.C.
United States Bankruptcy Court
District of New Jersey
Martin Luther King, Jr., Federal Building
50 Walnut Street
Newark, New Jersey 07102

RE: IN RE: PILGRIM MEDICAL CENTER 16-15414 -VFP
IN RE: NICHOLAS V. CAMPANELLA 16-21185-VFP

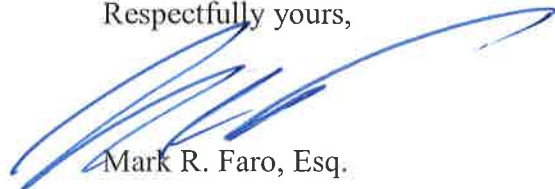
Dear Judge Papalia:

This firm has been retained by the Debtors, Pilgrim Medical Center and Dr. Nicholas Campanella, to represent them concerning a legal malpractice claim against the Law Offices of Orestis N. Kotopoulos, Orestis N. Kotopoulos, Esq., Jadoo & Zalenski, LLC, and Michael Zalenski, Esq. We have also been retained concerning a professional malpractice claim against Merwin & Paolazzi Insurance Agency, Inc. Kindly accept this correspondence as a status letter regarding this matter, in which we are working pursuant to an Order entered by Your Honor permitting this firm to litigate said matters on behalf of the Debtors.

The above referenced claims relate to a default judgment entered against our clients in the matter of Jalil v. Pilgrim Medical Center, ESX-L-7913-13. Expert review of materials for the purposes of ascertaining whether Affidavits of Merit may be issued is underway. Upon the completion of said review by the experts, should there be sufficient grounds for Affidavits of Merit to be issued, it is our intention to file suit.

Thank you for your consideration.

Respectfully yours,



Mark R. Faro, Esq.

cc: clients
Crew Schielke, Esq.
David L. Stevens, Esq.
Jerome N. Douglas, Esq.